NEVADA DIVISION OF ENVIRONMENTAL PROTECTION FACT SHEET

(pursuant to NAC 445A.236)

Permittee Name: Reno Plastics, Inc.

14291 Lear Blvd. Reno, NV 89506

Permit Number: NV0022012

Location: Reno Plastics, Inc.

14291 Lear Blvd.

Reno, Washoe County, NV

Latitude: 39° 38' 36" N, Longitude: 119° 53' 22" W

Township 21N, Range 19E, NE¹/₄ Section 31

General: From 1989 to 1991, BWC West, Inc., a subsidiary of the Bradford White Corporation, manufactured water heaters at this industrial site in Reno-Stead, Washoe County, NV. The manufacturing operations included metal stamping/forming, painting and assembly of water heaters. Degreasing liquids were used in the manufacturing process and were improperly disposed onto the soils surrounding the main plant building. The chlorinated contaminants of concern in these degreasers were 1,1–Dichloroethene (DCE), 1,1-Dichloroethane (DCA), and 1,1,1-Trichloroethane (TCA). Prior to bankruptcy, BWC West, Inc. installed a groundwater remediation system and commenced groundwater cleanup operations in July 1991. In addition, the contaminated soils were removed and a warehouse building and parking lot pavement were later built over the former disposal area. The property was then sold to American Water Heater Company (1992-2000), and now to the current owner/operator, Reno Plastics, Inc. The current owner manufacturers plastic cards (e.g., credit & gift cards), and all water heater-manufacturing operations ceased in 2000. Except for routine maintenance and repairs, the groundwater remediation system has been in operation for approximately twelve years.

The groundwater remediation process consists of extraction, air stripping and activated carbon adsorption. The treated groundwater is then discharged to a storm drain inlet. The pump and treat process is designed for 11 gpm. A total of 11 extraction and 15 monitoring wells have been installed on this property and an adjoining industrial neighbor, Master-Halco. Presently (3rd Quarter 2002 DMR Report), the influent to the treatment system has tested for the following contaminant levels: DCE, 50 μ g/L; DCA, 3.4 μ g/L; and TCA, 23 μ g/L. The corresponding EPA Maximum Contaminant Levels (MCL) for these pollutants are as follows: DCE, 7 μ g/L; DCA, no drinking water standard promulgated; and TCA, 200 μ g/L. Although MCL limits have been applied to the proposed permit conditions, it should be noted that the receiving water is not a drinking water supply source. Historically, the site operators have been able to meet these discharge limits as air stripping/carbon adsorption have treated the chlorinated contaminants to non-detect levels.



Photo #1: Air Stripper



Photo #2: Carbon Canisters

Flow: The design treatment capacity of this groundwater remediation system is specified as 11 gpm, which is equivalent to 0.0158 million gallons per day (MGD). Currently, discharge from this treatment system is averaging 1.0 gpm.

Receiving Water Characteristics: The storm drain inlet for the property's stormwater is located at the NW corner of the site. The topographical map delineates four seasonal lakes/ponds, which are located due north and west of the property site. The main water body is Silver Lake and the three smaller lakes/ponds are unnamed. These seasonal lakes/ponds generally only maintain standing water during periods of winter stormwater runoff and will dry (evaporate) completely in the summer. The nearest stormwater discharge point for the Permittee's property is located due north of the property across a railroad spur. This unnamed lake/pond is located approximately ¼ mile northeast of Silver Lake. The Nevada Administrative Code does not list any beneficial uses for Silver Lake and the three adjoining unnamed lakes, and therefore, these water bodies are unclassified waters without connection to waters of the U.S. These seasonal lakes are not used for municipal or domestic supplies. Groundwater occurrence at this site is shallow (4 to 14 ft. bgs) and the flow gradient is toward the north-northwest. The photo below was taken on March 26, 2003 when the receiving water body contained some accumulation of water (e.g., 0-3 ft.) due to recent storm (precipitation) events.



Photo #3: Receiving Water Body N of Property

Proposed Effluent Limitations and Special Conditions:

Table 1: Discharge Limitations

PARAMETER	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	30-Day Average	Daily Maximum	Measurement Frequency	Sample Type
Flow, MGD	0.0158 (11 gpm)		Continuous	Flow Meter
1,1–Dichloroethene, µg/L ¹	7		Quarterly	Discrete
1,1-Dichloroethane, μg/L ¹	Monitor & Report		Quarterly	Discrete
1,1,1-Trichloroethane, μg/L ¹	200		Quarterly	Discrete
pH, S.U.	Between 6.0 & 9.0		Quarterly	Discrete

1. EPA Method 601 (report all parameters).

Schedule of Compliance: There is no compliance requirement scheduled for submission to the Division at this time. The Division approved this facility's Operation and Maintenance (O&M) Manual in 1999. There has been no appreciable change in the operation of the remediation system since startup, except for routine repairs and replacement of spent carbon canisters.

Procedures for Public Comment: The Notice of the Division's intent to issue (renew) an NPDES permit authorizing the facility to discharge treated groundwater to an unnamed lake located ¼ mile northeast of Silver Lake, subject to the conditions contained within the permit is being sent to the **Reno Gazette-Journal** for publication. The notice is being mailed to interested persons on our mailing list. Anyone wishing to comment on the proposed permit can do so in writing for a period of thirty (30) days following the date of publication of the public notice in the newspaper. The comment period can be extended at the discretion of the Administrator. The deadline date and time by which all comments are to be submitted (via postmarked mail or time-stamped faxes, e-mails, or hand-delivered items) to the Division is **May 26, 2003 by 5:00 P.M.**

A public hearing on the proposed determination can be requested by the applicant, any affected State, any affected interstate agency, the Regional Administrator or any interested agency, person or group of persons.

The request must be filed within the comment period and must indicate the interest of the person filing the request and the reasons why a hearing is warranted.

Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the proposed discharge or any other area the Administrator determines to be appropriate. All public hearings must be conducted in accordance with NAC 445A.238.

The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

Proposed Determination: The Division has made the tentative determination to issue (renew) the proposed NPDES permit to the facility for a period of five (5) years.

Prepared by: Mark A. Kaminski, P.E.

Staff Engineer III

Bureau of Water Pollution Control

Date: April 23, 2003

Saved to: RenoPlastics factsheet